Exhibit B

Claim Chart re Asserted Claims of '511 Patent and
Exemplary Accused Products

Preliminary Comparison of U.S. Patent No. 7,952,511 to Tesla Vehicles

'511 Patent, Claim 1 Language	Tesla Vehicles Equipped with Cyclist Detection, Pedestrian Detection, Animal Detection or Vehicle Detection ("Accused Instrumentalities")
Claim 1. A method for detecting an object, comprising the steps of:	The Accused Instrumentalities implement a method for detecting an object (e.g., a cyclist, a pedestrian, an animal or a vehicle). https://www.techrepublic.com/article/teslas-autopilot-the-smart-persons-guide/.
defining expected characteristics of a scattered invisible electromagnetic radiation pattern to be detected at a receiver;	The method implemented by the Accused Instrumentalities includes defining expected characteristics of a scattered invisible electromagnetic radiation pattern to be detected at a receiver. For example, "Radar is the primary sensor used to detect the vehicle's surroundings, along with the front-facing cameras." https://www.techrepublic.com/article/teslas-autopilot-the-smart-persons-guide/. Further, "It's [Tesla vehicle's] cameras, ultrasonic sensors, and radars stay firmly focused on the road ahead and, importantly, on the not-insignificant number of pedestrians that cross the road. Autopilot knows the difference between cars, bicycles, motorcycles, and pedestrians." https://www.digitaltrends.com/cars/how-teslas-autopilot-system-sees-the-streets-of-paris/ Thus, as described above, each Accused Instrumentality includes a radar unit, which transmits invisible electromagnetic radiation to be detected at a receiver located on the Accused Instrumentality. When the region intermediate to the path taken by the incident and the observed electromagnetic radiation is devoid of confounding factors and objects, a standard (*i.e.*, a control-variable-like, or a background) baseline signal set—that can be used for comparison purposes—is established. For example, one standard background might be the open road in front of the Accused Instrumentality. This baseline can be updated in essentially real time as, for instance, atmospheric propagation conditions change and evolve or road-painting schemes alter from one section of pavement to the next.
attenuating at least a portion of an invisible electromagnetic radiation field by a presence of an object within a path of invisible	The method implemented by the Accused Instrumentalities involves attenuating at least a portion of an invisible electromagnetic radiation field by a presence of an object within a path of invisible electromagnetic radiation. For example, the reflection, absorption, and attenuation characteristics of a cyclist, pedestrian, animal, or vehicle will be different than the reflection, absorption, and attenuation characteristics of open road.

KR
Kent & Risley LLC

Preliminary Comparison of U.S. Patent No. 7,952,511 to Tesla Vehicles

'511 Patent, Claim 1 Language	Tesla Vehicles Equipped with Cyclist Detection, Pedestrian Detection, Animal Detection or Vehicle Detection ("Accused Instrumentalities")
electromagnetic radiation,	
said invisible electromagnetic radiation propagating off axis with respect to the receiver toward a scattering medium; and	The invisible electromagnetic radiation is propagated off axis with respect to the receiver toward a scattering medium. For example, invisible electromagnetic radiation is propagated from the radar unit toward a scattering medium (e.g., a road) in front of the vehicle. On information and belief, the radar unit comprises at least one transmitter and one separate and distinct receiver. The invisible electromagnetic radiation is therefore transmitted off-axis with respect to the receiver, although both are included in the Accused Instrumentality.
detecting the attenuation to indicate a presence of the object.	The method implemented by the Accused Instrumentalities involves detecting the attenuation to indicate a presence of the object. The vehicle uses "radar snapshots, which take place every tenth of a second, into a 3D 'picture' of the world. It is hard to tell from a single frame whether an object is moving or stationary or to distinguish spurious reflections. By comparing several contiguous frames against vehicle velocity and expected path, the car can tell if something is real and assess the probability of collision." https://www.tesla.com/blog/upgrading-autopilot-seeing-world-radar.
Claim 15. An apparatus for performing the method of claim 1, comprising:	As discussed above, the Accused Instrumentalities each constitute an apparatus for performing the method of claim 1.
means for storing expected characteristics of scattered electromagnetic radiation to be received at a receiver; and	The Accused Instrumentalities include means for storing expected characteristics of scattered electromagnetic radiation to be received at a receiver. "Radar is the primary sensor used to detect the vehicle's surroundings, along with the front-facing cameras." https://www.techrepublic.com/article/teslas-autopilot-the-smart-persons-guide/. The vehicle uses "radar snapshots, which take place every tenth of a second, into a 3D 'picture' of the world. It is hard to tell from a single frame whether an object is moving or stationary or to distinguish spurious reflections. By comparing several contiguous frames against vehicle velocity and expected path, the car can tell if something is real and assess the probability of collision." https://www.tesla.com/blog/upgrading-autopilot-seeing-world-radar.

KR
Kent & Risley LLC

Preliminary Comparison of U.S. Patent No. 7,952,511 to Tesla Vehicles

'511 Patent, Claim 1 Language	Tesla Vehicles Equipped with Cyclist Detection, Pedestrian Detection, Animal Detection or Vehicle Detection ("Accused Instrumentalities")
	"Initially, the vehicle fleet will take no action except to note the position of road signs, bridges and other stationary objects, mapping the world according to radar. The car computer will then silently compare when it would have braked to the driver action and upload that to the Tesla database. If several cars drive safely past a given radar object, whether Autopilot is turned on or off, then that object is added to the geocoded whitelist." https://www.tesla.com/blog/upgrading-autopilot-seeing-world-radar. The database of masses and shapes constitutes means for storing expected characteristics of scattered electromagnetic radiation to be received at a receiver.
a receiver for detecting the attenuation to indicate a presence of the object.	The Accused Instrumentalities include a receiver for detecting the attenuation to indicate a presence of the object. "Radar is the primary sensor used to detect the vehicle's surroundings, along with the front-facing cameras." https://www.techrepublic.com/article/teslas-autopilot-the-smart-persons-guide/. The vehicle uses "radar snapshots, which take place every tenth of a second, into a 3D 'picture' of the world. It is hard to tell from a single frame whether an object is moving or stationary or to distinguish spurious reflections. By comparing several contiguous frames against vehicle velocity and expected path, the car can tell if something is real and assess the probability of collision." https://www.tesla.com/blog/upgrading-autopilot-seeing-world-radar. As discussed above with respect to claim 1, the radar unit includes a receiver that detects the attenuation of at least a portion of an invisible electromagnetic radiation field to detect the presence of an object.

KR
Kent & Risley LLC